

EXHIBIT D

Andrew Russell

From: Andrew Russell
Sent: Wednesday, October 13, 2021 11:44 AM
To: David Chavous
Cc: Stamatios Stamoulis; Rachael Lamkin; Karen Keller
Subject: RE: Motion

Categories: Filed

David,

We noted for the Court that “circumstances may have changed.” D.I. 56 at 1. If you recall, you stated during our meet-and-confer that RDC had terminated your representation entirely, both at the district court level and on the appeal, and that you would not be filing a reply brief in the appeal. You then filed a reply brief in the appeal. I assumed that you were truthful when you stated that RDC had terminated your representation, and that they must have later resumed that representation in this case such that you could file an appeal brief. Thus, “[you] appear[] to still represent RDC.” *Id.*

Please do provide any communications with RDC that would help clarify this situation. Thank you,

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From: David Chavous <dchavous@chavousiplaw.com>
Sent: Wednesday, October 13, 2021 11:11 AM
To: Andrew Russell <arussell@shawkeller.com>
Cc: Stamatios Stamoulis <stamoulis@swdelaw.com>
Subject: Motion
Importance: High

Andrew,

Did you just accuse me of fraud on the court with this opposition? Because I have the communication that terminated my representation regarding the distinct matter of the fees discovery and all matters before the district court. You could have asked me to provide said communication after consultation with RDC. Instead, you filed this opposition implying I lied.

I expect a response from you on this.

Regards,

David A. Chavous, Ph.D.



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